Mr Lupe Navarro 1919 Brokaw Avenue, Corcoran, California 93212 Home Telephone No. - (559) 992 4286 Email - gnavarro1932@gmail.com

30 June 2012

Clerk of the Bankruptcy Court U.S. Bankruptcy Court, Room 621 Southern District of New York One Bowling Green New York, New York 10004-1408

Dear Sir / Madam,



Re:

Anderson Claim No. 51093, Request for Attorneys' Fees

Chapter 11, Case No. 09-50026 (REG)

I write <u>in support</u> of the Class Counsel's request for attorneys' fees and expenses with respect to the hearing that will be held in the Bankruptcy Court on July 26, 2012 at 9:45 AM, and submit this statement supporting my position and entitlement to benefits based on my original submitted claim form to GM in the 2009 class settlement in Anderson v. General Motors Corp.

Please note that I will <u>not</u> be attending this hearing in person and await to hear the decision of the Court in due course.

Yours sincerely,

Mr Lupe Navarro 1919 Brokaw Avenue

Corcoran, California 93212 Home Telephone (559) 992 4286

Copy:

A.J. De Bartolomeo, Esq. Girard Gibbs LLP 601 California Street Suite 1400 San Francisco, California 94108 THIS NOTICE CONTAINS IMPORTANT INFORMATION REGARDING THE

ANDERSON CLASS SETTLEMENT IN THE GM BANKRUPTCY PROCEEDINGS.

YOU SHOULD READ IT CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY.

IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH FO-CONSULT ONE.

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Chapter 11 Case Not ARREST YORK

In re

Chapter 11 Case Not ARREST YORK

99-50026 (REG)

If/k/a General Motors Corp., et al.

Debtors.

(Jointly Administered)

RULE 23(h) NOTICE OF REQUEST FOR ATTORNEYS' FEES TO BE PAID FROM SETTLEMENT FUND CREATED BY CLASS COUNSEL TO RESOLVE CLASS CLAIM IN GENERAL MOTORS BANKRUPTCY PROCEEDING

1. Why did I receive this Notice?

You are receiving this Notice because you were entitled to benefits under the original 2009 class settlement in *Anderson v. General Motors Corp.* and you submitted a valid claim form to GM in that settlement. In this Notice, people like you who submitted a valid claim form are referred to as the *Anderson* claimants.

When General Motors ("GM") filed for bankruptcy on June 1, 2009, the *Anderson* settlement and its payments to class members were put on hold under bankruptcy rules. Since then, Class Counsel have worked to obtain a recovery for the *Anderson* claimants. If Class Counsel had not stepped in and represented the *Anderson* claimants in the GM bankruptcy, each claimant would have had to file his own individual proof of claim by the November 2009 deadline, negotiate with GM to settle his claim, and have his claim approved by the Bankruptcy Court to receive any recovery.

Class Counsel are now asking the Bankruptcy Judge to approve a request for attorneys' fees and costs for the legal services they provided to the *Anderson* claimants after GM's June 1, 2009 bankruptcy filing. Class Counsel are asking the Court to approve a fee that is less than the fees they actually incurred working for the *Anderson* claimants in the bankruptcy. If the Bankruptcy Judge approves the request, the fees will be paid from the settlement fund.

Because you filed a valid claim, Federal Rule of Civil Procedure 23(h) requires that you be notified of this request for attorneys' fees and that you have the opportunity to tell the Bankruptcy Court your views on the fee request.